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Attorneys for Defendant

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

MARIA DOLORES MORALES BECERRA,
individually; CLARISSA BECERRA,
individually; RAYNA BECERRA,
individually; and RICHARD BECERRA, IN
HIS CAPACITY AS SPECIAL
ADMINISTRATOR FOR THE ESTATE OF
RAYMOND BECERRA, DECEASED;

Plaintiffs,

vs.

WALMART INC., a foreign business entity
dba WALMART; DOE INDIVIDUALS 1-10;
and ROE ENTITIES I-X, inclusive,

Defendants.

Case No.: 2:21-cv-02094-JCM-NJK

**JOINT MOTION TO EXTEND STAY OF
DEADLINES
[THIRD REQUEST]**

Plaintiffs MARIA DOLORES MORALES BECERRA, CLARISSA BECERRA,
RAYNA BECERRA, and RICHARD BECERRA, IN HIS CAPACITY AS SPECIAL
ADMINISTRATOR FOR THE STATE OF RAYMOND BECERRA (hereinafter "Plaintiffs")



1 and Defendant WALMART INC. d/b/a WALMART (hereinafter “Defendant” or “Walmart”), by
2 and through their respective counsel of record, do hereby jointly move the Court, in light of the
3 Parties’ settlement in principle of this matter, to stay all deadlines for an additional thirty (30)
4 days to finalize resolution of all matters in controversy in the above-referenced matter.

5 This is the third such request by either party to extend or modify the schedule. Good cause
6 exists because all matters in controversy between the Parties have been settled. The Parties have
7 exchanged settlement documents. Plaintiffs have signed the settlement and release agreements,
8 and Defendant has ordered the settlement checks. The Parties are now waiting for the settlement
9 checks to arrive so that they can be exchanged for the signed releases and the case can be
10 dismissed. The Parties believe that entry of a temporary stay will promote judicial economy and
11 preserve the Court’s resources. Accordingly, the Parties respectfully request a 30-day stay for the
12 above-referenced action, including any hearings or deadlines, through July 19, 2022.

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Wherefore, the Parties respectfully request that the Court enter an order staying all deadlines in this matter for thirty (30) days, through July 19, 2022, with the parties to either file a dismissal of all claims or alternatively to file a status report with the Court within 30 days of the Court's order entering the stay.

DATED this 17th day of June, 2022.

DATED this 17th day of June, 2022.

BAY LAW PERSONAL INJURY

ALVERSON TAYLOR & SANDERS

/s/ Christian A. Miles

/s/ Patrice Stephenson-Johnson

CHRISTIAN A. MILES, ESQ.

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1540 W. Warm Springs Rd., Ste. 110

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Henderson, NV 89014

Las Vegas, NV 89149

Attorneys for Plaintiffs

Attorneys for Defendant

IT IS SO ORDERED:

DATED: June 23, 2022

James C. Mahan
UNITED STATES DISTRICT JUDGE



CERTIFICATE OF SERVICE

Pursuant to FRCP Rule 5, I hereby certify that I am an employee of the law firm BAY LAW PERSONAL INJURY, and that on this 17th day of June, 2022, I electronically served a copy of **JOINT MOTION TO EXTEND STAY OF DEADLINES [THIRD REQUEST]** as follows:

☐ By facsimile addressed to the following counsel of record, at the address listed below;

☐ By placing same to be deposited for mailing in the United States Mail, in a sealed envelope upon which first class postage was prepaid in Las Vegas, Nevada;

☐ By Hand Delivery (ROC); and/or

☒ By Electronic Service through CM/ECF to:

PATRICE STEPHENSON-JOHNSON, ESQ.

Nevada Bar No. 12283

ALVERSON TAYLOR & SANDERS

6605 Grand Montecito Pkwy, Ste. 200

Las Vegas, NV 89149

Attorneys for Defendant

/s/ Christian A. Miles

An employee of Bay Law Personal Injury



Subject: RE: Becerra SAO to Stay
Date: Friday, June 17, 2022 at 11:08:35 AM Pacific Daylight Time
From: Patrice Stephenson-Johnson
To: Christian Miles
CC: Nihat Deniz Bayramoglu, Bhuvanesh Prembabu
Attachments: image001.png

Hi Christian,

You may affix my e-signature.

Best regards,

Patrice Stephenson-Johnson |
Alverson Taylor & Sanders
702.384.7000 | alversontaylor.com

From: Christian Miles <christian@baylawinjury.com>
Sent: Friday, June 17, 2022 10:02 AM
To: Patrice Stephenson-Johnson <PStephenson@AlversonTaylor.com>
Cc: Nihat Deniz Bayramoglu <deniz@baylawinjury.com>; Bhuvanesh Prembabu <bhuvan@baylawinjury.com>
Subject: Becerra SAO to Stay

Good Morning Patrice,

Our stay in Federal Court expires this coming Monday in the Becerra case. Attached to this email is a proposed Motion to Extend Stay to give us time for the settlement checks to come in and to exchange documents. Please let me know if I can submit the Motion using your electronic signature.

Best Regards,

**CHRISTIAN
MILES**
Personal Injury Attorney



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MAKE THEM
PAY WITH
BAY

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